UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK	-X
GLEN CRAIG,	: No. 16 Civ. 5439 (JPO)
Plaintiff,	:
-against-	:
UMG RECORDINGS, INC., KINGSID VENTURES, LTD., and ESTATE OF RILEY B. KING,	: : :
Defendants.	: :

## <u>PLAINTIFF'S MOTION FOR DISQUALIFICATION</u>

## I, BARRY I. SLOTNICK, declare as follows:

- 1. I am a partner at the law firm Loeb & Loeb LLP, attorneys for defendants UMG Recordings, Inc., Kingsid Ventures, Ltd. and Estate of Riley B. King (collectively, "Defendants"). I am fully familiar with the facts set forth herein and respectfully submit this declaration in opposition to Plaintiff Glen Craig's motion for disqualification of Jeffrey Sedlik (Dkt. No. 55).
- 2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's Answers and Objections to Defendants' First Set of Interrogatories to Plaintiff, dated November 25, 2016.
- 3. Attached hereto as **Exhibit B** is a true and correct copy of the December 21, 2016 letter from Richard Liebowitz regarding Plaintiff's responses to Defendants' requests for documents.

Case 1:16-cv-05439-JPO Document 62 Filed 12/22/17 Page 2 of 2

4. Attached hereto as **Exhibit C** is a true and correct copy of the January 27, 2017

letter from Richard Liebowitz containing supplemental responses by Plaintiff to Defendants'

First Set of Interrogatories to Plaintiff, and to Defendants' requests for documents.

5. Attached hereto as **Exhibit D** is a true and correct copy of documents Bates

labeled GC00019-GC00026, produced by Plaintiff to Defendants on November 25, 2016.

6. Attached hereto as **Exhibit E** is a true and correct copy of the transcript of the

deposition of Glen Craig, taken on March 17, 2017.

7. Attached hereto as **Exhibit F** is a true and correct copy of the expert report of Jeff

Sedlik, which was served on Plaintiff on October 13, 2017.

8. Attached hereto as **Exhibit G** is a true and correct copy of the complaint and

exhibits filed in Craig v. Getty Images (U.S.), Inc., et al, Case No. 17 Civ. 9916 (AJN) on

December 19, 2017 in the United States District Court for the Southern District of New York.

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true

and correct.

Dated: New York, New York

December 22, 2017

/s/ Barry I. Slotnick

Barry I. Slotnick

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2